

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case:2:21-cr-20104

Judge: Michelson, Laurie J.

MJ: Patti, Anthony P.

Filed: 02-10-2021 At 03:08 PM

INDI USA V JORDON SWITZER (LG)

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2422(b)

18 U.S.C. § 2252A(a)(2)

18 U.S.C. § 2253

JORDON SWITZER,

VS.

Defendant.

Plaintiff,

INDICTMENT

THE GRAND JURY CHARGES:

At all times during this indictment, Minor Victim 1 (MV-1) was either 14 or 15 years old (with a date of birth in February 2004), residing in the Eastern District of Michigan.

COUNT ONE

(Production of Child Pornography, 18 U.S.C. § 2251(a), (e))

At some point in 2019 and continuing through approximately September 2019, in the Eastern District of Michigan, and elsewhere, the defendant, JORDON SWITZER, attempted to and did knowingly employ, use, persuade, induce, entice, and coerce a minor, to wit: MV-1, to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2), for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be

transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce; such visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and such visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; all in violation of Title 18, United States Code, Section 2251(a), (e).

COUNT TWO (Online Enticement of a Minor, 18 U.S.C. § 2422(b))

At some point in 2019 and continuing through approximately September 2019, in the Eastern District of Michigan, and elsewhere, the defendant, JORDON SWITZER, did knowingly use a facility and means of interstate and foreign commerce (to wit: the Internet) to persuade, induce, entice and coerce a person who had not attained the age of 18 years, to wit: a MV-1, to engage in any sexual activity for which any person could be charged with a criminal offense, including but not limited to the production of child pornography, all in violation of Title 18, United States Code, Section 2422(b).

COUNT THREE (Receipt of Child Pornography 18 U.S.C. § 2252A(a)(2))

At some point in 2019 and continuing through approximately September 2019, in the Eastern District of Michigan, the defendant, JORDON SWITZER, did knowingly receive child pornography, as defined in 18 U.S.C. § 2256(8); and the

videos and images received by the defendant were mailed, shipped, and transported

using the Internet, a means and facility of interstate or foreign commerce, and were

mailed, shipped, and transported in or affecting interstate or foreign commerce by

any means, including by computer, in violation of Title 18, United States Code,

Section 2252A(a)(2).

[Space left intentionally blank.]

3

FORFEITURE ALLEGATION

1. The allegations of this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253 and Title 18, United States Code, Section 2428.

2. If convicted of an offense charged in Counts 1-3 set forth above, JORDON SWITZER, shall forfeit to the United States any and all materials and property used and intended to be used in the receipt, possession, and transportation of visual depictions of minors engaging in sexually explicit conduct, and any and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

Dated: February 10, 2021

SAIMA S. MOHSIN Acting United States Attorney

MATTHEW A. ROTH Assistant United States Attorney Chief, Major Crimes Unit

<u>s/Kevin M. Mulcahy</u>

KEVIN M. MULCAHY Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, Michigan 48226 313-226-9713 Kevin.Mulcahy@usdoj.gov

United States District Court Eastern District of Michigan NOTE: It is the responsibility of the Assistant U.S. At	Criminal Case Cove	MJ: Patti, An Filed: 02-10-	elson, Laurie J.
Companion Case information		Companion Case Number:	
This may be a companion case based upon LCrR 57.10 (b)(4)1:		Judge Assigned:	
□Yes ⊠No		JSA's Initials:	(w
Case Title: USA v. JORDON	SWITZER		
County where offense occurred : Oakland and elsewhere			
Check One: ⊠Felony ∠	☐Misder	neanor	Petty
Indictment/Information no prior complaintIndictment/Information based upon prior complaint [Case number: 21−mj−30030]Indictment/Information based upon LCrR 57.10 (d) [Complete Superseding section below]			
Superseding Case Information			
Superseding to Case No:		Judge:	
☐ Corrects errors; no additional charges or defendants. ☐ Involves, for plea purposes, different charges or adds counts. ☐ Embraces same subject matter but adds the additional defendants or charges below:			
Defendant name	Charge	<u>es</u> <u>Pr</u>	ior Complaint (if applicable)
			/
Please take notice that the below I the above captioned case.	isted Assistant United	States Attorne	y is the attorney of record for
February 10, 2021 Date	211 W. Fort S Detroit, MI 40 Phone: (313) Fax: (313) E-Mail addres	ed States Attorney Street, Suite 200 3226-3277	01 .

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.